

Exhibit A

Richard Gross

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Bailey, et al. (civil commitments) Time

Date	Time Spent (hours)	Activity
7/23/09	1.0	Talk with Rothman re case and read Rakoff decision denying motion to dismiss
7/24/09	.1	Talk with Jeff re Ameer appearance before Rakoff today
7/27/09	.5	Reviewed and made notes on Patterson, Miner V Glens Falls
	2.5	Massei complaint sent to Rothman; review of Patterson v. Coughlin, and Miner cases
7/29/09	.3	Review for meeting with other counsel
	3.5	Meeting with other consortium counsel re case
8/7/09	.3	Phone conversation-Benno
8/11/09	1.7	Emails re developments re class action, and re SOL issues (false imprisonment, Heck concerns); Review of Beeno opposition to motion to dismiss and SVP background sheets
	2.6	Meeting with other consortium counsel re discovery issues and case strategy, and re class action issues
8/13/09	1.3	Emails with other counsel read Benno letter brief to J Rakoff re amendment to add class allegations; Rakoff, decision and rules, email to consortium
	.2	Review Benno letter brief-Motion to Amend
	.2	Review Rackoff-SJ reaffirming denial, Rackoff Rules
8/14/09	.2	Emails with Benno re conf. call today with Rakoff re possible bifurcation
	.3	Review of documents-defendant list, request for documents.
	.3	Talks with other Ps counsel re discov issues
8/15/09	.2	Emails re talk with AG's office and next steps
8/17/09	.3	12(c) motion
	.5	Review of Massei complaint and answer; Rezzi chart re liability
	1.5	Meeting with other counsel re 12(c) motion and re new plaintiffs and re discovery issues and re striking affirm defenses

8/19/09	.4	Review Article 10-discuss
	.2	Emails re subpoena to Parole and re class complaint
8/20/09	.5	Emails re subpoenas and other discovery matters, and re fee matters
8/21/09	.7	Review disclosure -Massei, Trocchio , class action allegation, Rackoff decision 8/19, subpoena, case management order Emails re discovery issues
8/23/09	.4	Correspondence-disclosures--subpoenas-EBT's
8/24/09	.2	Emails re discovery issues
8/25/09	.3	Phone call re discov with Roth
8/26/09	.2	Review class action complaint-Benno
8/26/09	1.5	Meeting re discovery matters and re things to do
8/27/09	.8	Review of previous materials
	.2	Emails re discovery
	.1	Email re Rakoff decision re subpoena issuance
	.2	Further conf. call with colleagues, and with law clerk
8/28/09	.2	Review and edits regarding letter to Rakoff to quash MHLS subpoena
	.4	Emails re class complaint / jury demand or not, and conference call re same
	.5	Emails re discovery and motion matters, and re deps
9/11/09	.3	Review memo of law on 12(c) and strike 12(f)
	1.6	Conf. call with other consortium counsel re discovery, deps, experts
	.1	Emails with other consortium counsel re discovery, deps, experts
9/22/09	.7	Review and analyze defendants opp - 12 c motion
10/20/09	.4	Read Ds' opp to our motion challenging their priv assertions
	.3	Read Ds' motion for prot order barring upper level deps
10/21/09	.7	Found, reviewed and materials to Benno re Ds' motion for prot order barring upper level deps
	3.0	Meeting with plaintiffs' team (half hour was talking to Rothman)
10/25/09	.3	Read AG's motion to vacate prot. order re use of Ps dep tnspts
	.3	Read emails from Mantell re AG's motion to vacate prot order re use of info at Ps' Art 10 proceedings
	.3	Read Ds' reply re deps of high-ranking deponents
11/1/09	.4	Read Benno opp to AG's motion to vacate prot order re use of P's dep testimony at Art. 10 proceedings
11/2/09	.5	Read Rakoff decision and emails re upper-level dep quashing

11/2/09	2.5	Meeting with team members
11/3/09	.5	Conf. call with other team members
	.2	Further talk with other team members re discovery issues
	.2	Review SDNY Local Rule 54.1, and email re same.
11/13/09	.4	Read AG's opp to our questions to 2 supervisors
	2.5	Meeting with other Ps' counsel - participated by phone
11/15/09	.2	Emails re discovery issues
11/23/09	1.0	Meeting with other consortium counsel
	.1	Read Rakoff decision re lifting protective order
11/30/09	.2	Read Rakoff interim decision re whether to quash supervisory deps; emails re same and re motion on the pleadings
	.2	Emails re Rakoff order for Carpinello to appear in court to be questioned ex parte
12/15/09	2.5	Meeting re deposing Pataki
12/21/09	.2	Emails re dep scheduling
12/22/09	.2	Emails re dep scheduling
1/5/10	3.5	Mtg with other Ps' consortium counsel, and conf. call with Rakoff's law clerk
1/6/10	.3	Emails re import of Rakoff decision to allow supervisors to testify at the trial, but only w/in the scope of their 2 hour dep testimony
1/18/10	.3	Read Rakoff denial of our motion for judgment on the pleadings
	.4	Talk to Rothman re Pataki dep and spoliation issues re governor's files
2/4/10	1.1	Conference call Benno and Roth regarding using Dr. Harris
2/12/10	.3	Email -other Ps' counsel re Pataki dep and spoliation issue
2/18/10	2.3	Meeting with other Ps' counsel re spoliation and discovery issues
3/18/10	.3	Read AG's opp re deliberation process priv documents
	.4	Talk to Benno re SJ motion
	.1	Read Rakoff Order re the attny-client priv'd document
3/24/10	.5	Discussions with co-counsel re 30 b 6 dep
4/29/10	1.5	Meeting - cocounsel - motions and trial discussed
5/24/10	.4	Review emails - interloc appeal and associated issues
6/16/10	.3	Review emails-re Art 10 applicability to our case
	1.0	Discussions with co-counsel re SJ motion and potential spoliation motion
7/9/10	1.8	Meeting with other consortium counsel re Rakoff's ruling
10/26/10	.5	Read Rakoff's Opinion of today re SJ decision
10/27/10	.3	Emails with counsel re the Rakoff Opinion's reasons for denial of our motion for SJ
11/3/10	.2	Emails re meeting to discuss Ds' appellate brief

11/18/10	.9	Read Ds' appellate brief
12/20/10	1.7	Meeting -other -plaintiff's counsel
2/6/11	.5	Emails re the appeal
2/7/11	1.1	Meeting -other -plaintiff's counsel
3/24/11	.2	Emails re class issues
4/1/11	.2	Emails re class issue
5/25/11	.2	Emails with co-counsel re logistics for conference call
	.8	Conference call with co-counsel re class action
	.2	Emails re meeting to discuss Ds' appellate brief
11/21/11	1.4	Meeting - re Brooks situation, Burgos death, discovery, class action, and release from custody problem
1/30/13	.1	Email Re Burgos
2/14/13	.9	Read 2d Circuit decision
	.3	Emails Re decision
2/15/13	1.0	Meeting -other -plaintiff's counsel
2/18/13	.6	Conference call(s) with team on train re making new settlement demand, next steps
2/21/13	.3	Emails Re Court of Claims case
2/28/13	.2	Read email- settlement
3/4/13	.1	Email -settlement demand
3/5/13	.1	Email to re the call with Rakoff, and the 7/8/13 trial
3/6/13	.1	Email for meeting set up
3/8/13	.1	Email Re substitution
4/6/13	.8	Review proposed settlement letter
4/8/13	.5	Emails - calls re demand letter –
4/20/13	.2	Email re our fees and costs for AG -settlement
4/21/13	1.0	Conference call with co-counsel re our fees and costs - settlement
	Total 73.1	